



SDMS DocID 2074102

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PFE ORIGINAL



"Christie, Mike"  
<MChristie@penn-er.com>  
08/23/2006 03:03 PM

To Joseph McDowell/R3/USEPA/US@EPA  
cc  
bcc  
Subject RE:

Joe:

Attached are a few suggested changes. I will forward the 3000 HD work plans under separate cover.

Mike

-----Original Message-----

From: McDowell.Joseph@epamail.epa.gov  
[mailto:McDowell.Joseph@epamail.epa.gov]  
Sent: Tuesday, August 22, 2006 2:32 PM  
To: Christie, Mike  
Subject: RE:

Mike,

here is an excerpt from the FYR, in advance of the complete document. This comes from the discussion of the work completed.

Also, I'll need to discuss 3000 Horizon, so could you pls send me the remedial action work plans?

thanks

joe

(See attached file: LPT\_work.doc)

"Christie, Mike"  
<MChristie@penn-er.com>

08/22/2006 02:11  
PM

To  
Joseph McDowell/R3/USEPA/US@EPA  
cc  
Subject  
RE:

Joe:

PFE ORIGINAL

Pink is 2300 and 2500 Renaissance and 2700 and 2900 Horizon. 2300 and 2500 are the only ones that were in the pipe path.

Please let me know if you need anything additional.

Thanks,  
Mike

-----Original Message-----

From: McDowell.Joseph@epamail.epa.gov  
[mailto:McDowell.Joseph@epamail.epa.gov]  
Sent: Tuesday, August 22, 2006 11:47 AM  
To: Christie, Mike  
Subject:

Mike,

what are the current addresses for the pink parcels where the pipeline ran?

thanks

joe



LPT\_work.doc

## Operable Unit 5 – WAL Pipeline

Liberty owns the properties located at 2201 and 2301 Renaissance Boulevard. The 2201 Renaissance Boulevard property was developed by Liberty and is currently occupied by an office building, associated parking lots and a storm water detention basin. Liberty has also completed development of the adjacent 2301 Renaissance Boulevard property with a second office building, associated parking lots, and two storm water detention basins.

As part of Liberty's due diligence survey, Liberty retained Penn Environmental & Remediation, Inc. (Penn E&R) to complete due diligence and a site characterization of the property. During this site characterization, Penn E&R encountered two buried pipelines located one on top of the other on the west side of the property. The pipelines entered the site near Renaissance Boulevard and ran south/southwest along a dirt access road to a point where they exited the property in the southwest corner of the parcel. The buried pipelines appear to have followed the course of, and to have been located directly beneath, an aboveground pipeline which was also reportedly located in this area. The pipelines transported WAL from the former Allen Wood Coke facility, which was located about 1 mile east of the site, to Quarry Nos. 1 through 3. No portions of the reported aboveground pipeline were ever identified on these properties.

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Penn E&R implemented a program of pipeline removal and additional sampling. The activities implemented were outlined in a work plan developed by Penn E&R entitled "Work Plan to Complete Additional Site Characterization Activities and To Remove a Buried Pipeline at the Yellow Parcel in the Renaissance Park Commercial Development," dated June 25, 1998. The activities outlined in the Work Plan and which were implemented included the following:

1) collection and analysis of surface and subsurface soil samples along the length of the former pipeline; 2) the collection and analysis of sediment samples from an adjacent drainage swale; 3) the removal of the buried pipeline; 4) the excavation of potentially impacted soil located beneath the buried pipeline; 5) the collection of post-excavation soil samples from the remediated areas; and 6) the implementation of a focused risk assessment.

The pipeline was removed in two separate phases. The first phase was implemented in September 1999 and included the removal of the northern half of the pipeline. The southern half of the former pipeline ran through a portion of an area designated as a wetland. Prior to removing the pipeline from this wetland area, Chester Valley Engineers, on behalf of Liberty, submitted a General Permit No. 5 Application to PADEP to remove the pipeline from the wetland area. PADEP approved this request and in April of 1999 issued a general permit to complete this work. The permit number issued by PADEP for this work was GP No. 054699324. On January 18, 2000, a Revised Erosion and Sediment Pollution Control (ESPC) Plan developed by Chester Valley Engineers was submitted to the Montgomery County Conservation District (MCCD). This revised ESPC plan incorporated the activities associated with the removal of the pipeline from the wetland area. On January 20, 2000, the MCCD approved the revised plan and issued a general permit (General permit #PAR10T555) to complete the removal of the pipeline

from the wetland area. After obtaining all appropriate permits, the southern half of the pipeline were removed in March 2000.

As part of the site characterization, surface and subsurface soil samples were collected along the length of the former pipelines and sediment samples were collected from a swale that drained the western end of the site. The results of this sampling indicated that soils at five specific locations along the pipelines had been impacted by the pipeline; however, no impact to the swale was documented. These five areas along the former pipes were remediated, and all potentially impacted soil (approximately 220 cubic yards) was excavated from these areas. Upon completion of the remedial activities, post-excavation soil samples were collected and each area was backfilled with clean soil.

The results of the analysis of the post-excavation samples and other samples collected during the site characterization indicate that remaining soils and sediments, based on comparison to PADEP Act 2 non-residential Statewide Medium Specific Concentrations (MSCs), do not present a human health concern. Several of the analytical results included PAH compounds and the metals arsenic, iron and lead at concentrations that exceeded their EPA Risk Based Concentrations (RBCs). To ensure that these exceedances did not represent an unacceptable risk, a site-specific risk assessment was completed. The results of the risk assessment indicated that the future use of the 2301 Renaissance Boulevard property for commercial purposes would not result in an unacceptable risk to industrial workers, construction workers, or adolescent trespassers.

Liberty also owns the properties located at 2300 and 2500 Renaissance Boulevard. As part of Liberty's due diligence survey, Liberty retained Penn E&R to complete due diligence and a site characterization of this property. Another portion of the WAL pipeline was also encountered on this property during these due diligence activities. Based on its presence and to allow the continued development of the tract, Liberty decided to remove the pipeline. Penn E&R submitted a work plan to EPA for the removal of this portion of the pipeline entitled "Work Plan to Remove a Pipeline Located on Lots 14 Through 29 (Pink Tract) in the Renaissance Park Commercial Development" dated February 10, 1998.

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Prior to the removal of the pipeline, Penn E&R installed a test trench parallel with and adjacent to the area where the pipeline would have crossed Renaissance Boulevard. A similar test trench was excavated on the opposite side of Renaissance Boulevard on the 2301 Renaissance Boulevard property. Each of these test trenches was about 15 feet long by 2 feet wide by about 5 feet deep. No evidence of the pipeline was encountered in either of the two test trenches. After determining that the pipeline did not currently cross Renaissance Boulevard, the southern end of the pipeline was uncovered. The pipeline at this location was encountered at a depth of 3 feet below the ground surface and was open ended. After uncovering about 100 feet of the pipeline it abruptly ended. To ensure that no other portions of the pipeline were located beneath this property, six additional test trenches were excavated along the path that the pipeline would have followed had it continued to run in the same direction that the pipeline encountered was running. The test trenches started near the end of the northeast portion of the pipeline and were spaced

at selected intervals in a northeast direction to within 35 feet of Horizon Drive. The test trenches were generally 15 to 20 feet long, 2 feet wide and 5 feet deep. No evidence of the pipeline was encountered in any of the six test trenches. This suggests that the pipeline over the area covered by the six test trenches had been previously removed.

Three post-excavation soil samples were collected from beneath the excavated pipeline. The analytical results are compared to both EPA's RBCs and PADEP's MSCs. None of the contaminants of concern (COC)s were detected above applicable PADEP MSCs. With the exception of benzo(a)pyrene, dibenzo(a,h)anthracene, arsenic and thallium, none of the COCs were detected above the USEPA's RBCs.

ADD DISCUSSION HERE ABOUT KEYSTONE COKE PIPELINE REMOVAL & 3000 HORIZON DRIVE

#### Operable Unit 7 - CSFA

Liberty owns the properties located at 2201 and 2301 Renaissance Boulevard. The 2201 Renaissance Boulevard property was developed by Liberty and is currently occupied by an office building, associated parking lots and a storm water detention basin. Liberty has also completed development of the adjacent 2301 Renaissance Boulevard property with a second office building, associated parking lots, and two storm water detention basins.

As part of Liberty's due diligence survey, an area of fill material was identified in the north-central portion of their 2301 Renaissance Boulevard property. This fill area was designated the Cinder/Slag Fill Area (CSFA). The CSFA was characterized through the installation of test pits and soil borings and the submittal of samples for laboratory analysis. Based on the results of these previous site characterization activities, the material in the CSFA was determined to consist primarily of glass, ash, coal dust, cinders, and slag, and encompassed an area 250 feet long by 150 feet wide. The thickness of the fill ranged from 1-foot along the perimeter of the area, to up to 20 feet in the central portion of the CSFA. However, the fill material was, on average, from 3 to 4 feet thick. The source of the fill is not known; however, based on historical aerial photographs, it was placed in this area prior to 1959.

The ROD selected capping, in accordance with 25 Pa Code Sections 288.234 and 288.236-237, as the appropriate remedy for Quarries 1, 2 and 4 and other contaminated soil areas, and the excavation and off-site disposal of impacted soils/sediments located in Quarry 3. Although not investigated as part of the Crater RI/FS or identified as an area of concern in the ROD, EPA considered the CSFA to be a contaminated soil area related to the Crater Resources site and designated this area OU 7.

Liberty discussed with EPA the remediation of the CSFA via capping and/or the excavation and off-site disposal of the contents of this area. Based on these discussions, the remedial action selected for and implemented at the CSFA included the excavation and off-site disposal of all potentially impacted materials and soils. The implementation of this remedy enabled the planned development to proceed on schedule, and without any

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impacts on the planned use of the property. This remedy meets the Remedial Action Objectives and Performance Standards of Section VIII and XII, respectively, of the ROD, and satisfies the Statutory Determinations of Section XIII of the ROD.

The remedial action implemented in the CSFA were completed in accordance with the document developed by Penn E&R on behalf of Liberty entitled "Remedial Design/Remedial Action Work Plan for the Cinder/Slag Fill Area Located at 2301 Renaissance Boulevard in Upper Merion Township, Montgomery County, PA", dated October 10, 2001 (Final). This work plan was approved by the EPA on October 29, 2001.

The remediation of the CSFA was implemented between September and November 2001 and included the excavation and off-site disposal of approximately 5,500 cubic yards or 7,100 tons of potentially impacted fill and soil. Upon completion of the remedial activities, forty nine post-excavation soil samples were collected from the CSFA. No site-specific cleanup standards for the CSFA were included in the ROD. However, based upon discussions with and approval of EPA, a Focused Risk Assessment (FRA) was implemented using the results of the post-excavation sampling to evaluate the effectiveness of the remedial activities implemented in the CSFA. Potential risks to industrial and on-site adult construction workers were evaluated, as were potential impacts to groundwater.

Based on results of the post-excavation soil samples and the FRA, the remedial action implemented in the CSFA was successful in removing all potentially impacted soil. The soils remaining in the CSFA do not present an unacceptable risk to construction or industrial/office workers at the site, and leaching of potential contaminants to the groundwater at unacceptable levels will not occur. On September 22, 2003, Liberty submitted a report to the EPA entitled "Remedial Action Report for the former Cinder/Slag Fill Area Operational Unit 7" which documented the results of the remedial activities that were completed in the former CSFA. The USEPA provided comments regarding their review of the August 29, 2002 report in a letter dated April 2, 2003.

Liberty has developed the 2301 Renaissance Boulevard property for commercial office use only, consistent with the commercial use zoning of this property, and does not intend to use the 2301 Renaissance Boulevard property for any residential or child care purposes. Given that no residential assessments have been performed, Liberty will implement an institutional control for the CSFA at the 2301 Renaissance Boulevard property to notify any future owners of the need for additional assessment in the event of residential use or development of the CSFA. The notification will be included in the deed to the 2301 Renaissance Boulevard property upon any future transfer of this property by Liberty to a new owner. The notice may also incorporate notice and controls for other areas of the Renaissance Boulevard property as needed.

#### Institutional Controls

The ROD required ICs to restrict groundwater use until clean up levels are achieved. Such restrictions have been implemented for portions of the property. A Restrictive Covenant between the Crater PRP Group and the owners of 4 lots impacted by the Site was entered into on December 21, 2005. This covenant prohibited the installation or use of new groundwater wells or use of any existing groundwater wells; as well as prohibiting any residential use of these lots. In addition, residents in the immediate area of contamination obtain their drinking water from a public water supply, and therefore are not exposed to contaminated groundwater. No residents are using the groundwater for drinking purposes in the immediate area of contamination.